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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 20-00204 WHO
	)	[FILED MAY 13, 2020]
Plaintiff,	)	
	)	NOTICE OF RELATED CASE IN A CRIMINAL
v.	)	ACTION
	)	
NICK JAMES BOVIS,	)	
	)	
Defendant.	)	

UNITED STATES OF AMERICA,	)	NO. CR 20-00257 WHO
	)	[FILED JUNE 23, 2020]
Plaintiff,	)	
	)	NOTICE OF RELATED CASE IN A CRIMINAL
v.	)	ACTION
	)	
WING LOK "WALTER" WONG,	)	
	)	
Defendant.	)	

UNITED STATES OF AMERICA,	)	NO. CR 20-00353 WHO
	)	[FILED SEPTEMBER 16, 2020]
Plaintiff,	)	
	)	NOTICE OF RELATED CASE IN A CRIMINAL
v.	)	ACTION
	)	
BALMORE HERNANDEZ,	)	
	)	
Defendant.	)	

NOTICE OF RELATED CASES

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 SANDRA ANN ZUNIGA,

5 Defendant.

) NO. CR 21-00096 WHO  
) [FILED MARCH 8, 2021]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 ALAN VARELA and  
11 WILLIAM GILMARTIN III,

12 Defendants.

) NO. CR 21-00192 SI  
) [FILED MAY 7, 2021]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 PAUL FREDRICK GIUSTI,

17 Defendant.

) NO. CR 21-00294 VC  
) [FILED JULY 27, 2021]

) NOTICE OF RELATED CASE IN A CRIMINAL  
) ACTION

19

20 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court

21 that the above-captioned criminal cases are related. Defendants Bovis, Wong, Hernandez, Zuniga, and

22 Gilmartin each pleaded guilty and will be cooperating in a public corruption case against Mohammed

23 Nuru and others, involving a scheme to defraud the City and County of San Francisco, and the people of

24 San Francisco, of the honest services of Mohammed Nuru and related public corruption offenses.

25 Defendant Giusti is likewise charged with conspiracy to commit bribery and deprive the public of the

26 honest services of Mohammed Nuru. Mr. Giusti has signed a cooperation plea agreement in which he

27 has agreed to plead guilty and testify, provide documents, and otherwise assist in the government's

28 investigation.

NOTICE OF RELATED CASES

1 Based upon these facts, the cases are related within the meaning of Local Rule 8-1(b)(1) because  
2 they involve the same events and occurrences. Furthermore, the cases are related within the meaning of  
3 Local Rule 8-1(b)(2) because, if heard by separate judges, the actions likely would involve substantial  
4 duplication of labor by the two judges.

5 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that assignment  
6 of these cases to a single judge is likely to conserve judicial resources and promote an efficient  
7 determination of each action.

8  
9 DATED: July 28, 2021

Respectfully submitted,

10 STEPHANIE M. HINDS  
11 Acting United States Attorney

12 /s/  
13 SCOTT D. JOINER  
14 Assistant United States Attorney